

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: May 9, 2002/ 1430

Site Contact(s): Kim Myers, RISS Environmental
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Regulatory Contact: James Hindman, CDPHE
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Agency: CDPHE

Purpose of Contact: Discussion of CDPHE comments on the RSOP Notification Letter for the RCRA Units in B865 and B866 submitted under the Component Removal, Size Reduction, and Decontamination Activities RSOP, and to document the revised management of waste generated under this RSOP Notification Letter

Discussion

James and I discussed our previous conversation in which I had stated the project's approach to management of the interim status RCRA units 40 17, 40 18, 40 19, and all associated ancillary equipment, which was different from what was stated in the RSOP Notification Letter 02-DOE-00217. In this conversation we discussed that although "clean closure" had not been attained for this system, the system (tanks and ancillary equipment) did not need to be disposed of as RCRA hazardous waste since the system failed only for cadmium (0.034 ppm), chromium (2.1 ppm), lead (1.2 ppm), and mercury (0.004 ppm)¹. Therefore, the system and all ancillary equipment will be disposed of as Low Level waste, unless the system can also be decontaminated for radioactive contamination, in which case it will be disposed of as non-radioactive solid waste.

Additionally, we discussed the comments from CDPHE received via email, concerning this same RSOP Notification Letter. The first comment requested more detailed maps or drawings. However, the maps and drawings that were provided are the only ones the site has available. After again reviewing what had been provided, James agreed that these were sufficient.

¹ As stated in the RSOP Notification Letter 02-DOE-00217, all other analytes (i.e., listed hazardous constituents) were below RFCA Attachment 5, Table 2, Tier II – Groundwater Action Levels, therefore clean closure was attained for all but the above characteristic constituents. Because the above characteristic constituents are below TCLP levels the tanks and ancillary equipment are not hazardous waste. Closure of the system will be accomplished by removal.

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The second comment from CDPHE was based on a "cut and paste" error in the RSOP Notification letter, in which the hazardous waste code D004 (arsenic) was applied to the system. This is incorrect and was a "cut and paste" error from a previous document.

The third comment addressed the "Clean Closure Option #3, from the Component Removal, Size Reduction and Decontamination RSOP, for the sump 145A in B865. We discussed that the sump did not meet clean closure for beryllium and nickel, but all other analytes (including listed constituents) were below RFCA Attachment 5, Table 2 Tier II - Groundwater Action Levels. Since neither of these constituents would make the concrete sump hazardous waste, the subcontractor performing the decommissioning in B865 will either remove the concrete sump as Low Level solid waste, or perform appropriate characterization sampling to determine if the concrete meets free release criteria, as defined in the Concrete Recycling RSOP.

The fourth comment references one of the photos provided in the RSOP Notification Letter. This photo labels elevated piping "from B883 to B866." In reality this is an error and should be labeled "from B865 to B866."

The last CDPHE comment requested that IWCPs be provided. I explained that the subcontractor would not be using IWCPs, but that once a work package has been developed for this job, the package would be provided as part of the consultative process.

Additionally, James asked about the covered sump in B866, which was addressed during B889 closure. I told him I believed that the sump had been closed during the RCRA closure activities associated with B889, but that I would do some research to validate this information. I reviewed several documents in the CERCLA AR associated with B889 closure and found nothing that addressed this sump in B866. Therefore unless further information is discovered that documents the RCRA closure of this sump, the sump and anything in the sump below the metal plate will be removed as LLM waste with the following EPA codes applied to the waste: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D028, D029, D035, D038, D040, D043, F001, F002, F003, F005, F007, F008, and F009.

Contact Record Prepared By: Kim Myers

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